

# Exhibit A

| <u>Request</u>     | <u>Description</u>   | <u>Already Produced or To Be Produced or Addressed</u><br><br><u>(I)</u> | <u>Related to Settlement Negotiations</u><br><br><u>(II)</u> | <u>Subject to Attorney-Client Privilege, Work Product Doctrine or other Confidentiality</u><br><br><u>(III)</u> | <u>Irrelevant, Overly Broad, Unduly Burdensome, or Publicly Available</u><br><br><u>(IV)</u> | <u>Pertaining Only to NFL Parties</u><br><br><u>(V)</u> |
|--------------------|--|--|--|---|--|---|
| Document Request 1 | The documents exchanged among one or more of Representative Plaintiffs, the NFL Parties, the Mediator, and/or the Special Master, to the extent not already disclosed in Docket Entries 6167 and 6168, relating to settlement discussions in this lawsuit. |  | X  | X   |  |   |
| Document Request 2 | All drafts of the Settlement and all drafts of the earlier settlement agreement that was filed in this action on January 6, 2014.  |  | X  | X   | X  |   |
| Document Request 3 | All drafts of the long form and short form notice sent to the class.   |  | X  | X   | X  |   |
| Document Request 4 | All player surveys, physician surveys, and data sets regarding the consequences of TBIs among football players.  |  |  | X   |  |   |
| Document Request 5 | All documents reflecting any cost/benefit analyses performed concerning injuries resulting from TBIs and changes to NFL football, including changes to the rules of the game.  |  |  |   |  | X   |

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|--------------------|--|--|--|---|--|---|
| Document Request 6 | All documents regarding projections of the incidence of CTE, Alzheimer's Disease, Parkinson's Disease, or ALS in retired NFL players, including any documents consulted or relied upon in determining responses to Interrogatory Nos. 1 and 2 below. | X  |  | X   | X  |   |
| Document Request 7 | Materials provided by the NFL Parties to members of the MTBI Committee, and agendas and minutes of the meetings of the MTBI Committee.   |  |  |   |  | X   |
| Document Request 8 | All documents reflecting communications by the NFL Parties to NFL players or teams concerning the risks, or lack thereof, associated with TBIs.  |  |  | X   |  |   |
| Document Request 9 | All documents reflecting health risks to football players associated with TBIs.  |  |  | X   | X  |   |

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|-----------------|---|--|--|---|--|---|
| Interrogatory 1 | State your best estimate as to how many retired NFL players had each of Alzheimer's Disease, Parkinson's Disease, ALS, and CTE at any time prior to July 7, 2014, and state how each estimate was determined. For the estimate as to CTE, specify how many of the estimated number of players were alive and how many were deceased as of July 7, 2014. If any of the estimates include players who also are included in your estimate for another of the listed maladies, please specify that for those estimates. | X  |  |   |  |   |

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|-----------------|--|--|--|---|--|---|
| Interrogatory 2 | State your best estimate as to how many retired NFL players will have each of Alzheimer's Disease, Parkinson's Disease, ALS, and CTE during the 65 years following July 7, 2014, and state how each estimate was determined. If any of the estimates include players who also are included in your estimate for another of the listed maladies, please specify that for those estimates. | X  |  |   |  |   |
| Interrogatory 3 | Why does the Settlement provide a Monetary Award of up to \$4 million to retired NFL players who died with CTE prior to July 7, 2014, but does not provide the same Monetary Award to a retired NFL player who dies with CTE after that date?  | X  | X  |   |  |   |
| Interrogatory 4 | Why does the Settlement provide a 75% reduction in any Monetary Award to retired NFL players who suffer a stroke or who incur a single TBI?  | X  | X  |   |  |   |

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| Interrogatory 5    | Why does the Settlement exclude credit for years played in the World League of American Football, the NFL Europe League, or the NFL Europa League?  | X  | X  |   |  |   |
| Interrogatory 6    | Identify any information that was exchanged between the Representative Plaintiffs and the NFL Parties and that is not contained in the documents being produced in response to Document Request No. 1 above.  |  | X  |   |  |   |
| Interrogatory 7    | Provide the name and professional qualifications of each individual on whose testimony (written or oral) any of the Settling Parties intends to rely at the fairness hearing, and for each such person identify the substance of the testimony.     | X  |  |   |  |   |
| Deposition Topic 1 | Whether “the NFL has been aware that multiple blows to the head can lead to long-term brain injury, including but not limited to memory loss, dementia, depression, and CTE and its related symptoms,” as alleged in paragraph 89 of the Complaint. |  |  |   | X  |   |

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| Deposition Topic 2 | Whether “the NFL misled players, coaches, trainers, and the public, and actively spread disinformation” regarding the potential consequences of TBIs, as alleged in paragraph 223 of the Complaint. |  |  |   | X  |   |
| Deposition Topic 3 | The exchange of information and negotiations that resulted in the Settlement.   |  | X  |   |  |   |
| Deposition Topic 4 | The analysis of the number of retired NFL players who had Alzheimer’s Disease, Parkinson’s Disease, ALS, or CTE at any time prior to July 7, 2014.  | X  |  |   | X  |   |
| Deposition Topic 5 | The analysis and projections of the number of retired NFL players who will have Alzheimer’s Disease, Parkinson’s Disease, ALS, or CTE at any time after July 7, 2014.                               | X  |  |   | X  |   |

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| Deposition Topic 6 | How the amounts were calculated for the Baseline Assessment Program in the Settlement as well as the Monetary Award Fund in the initial settlement proposed to the Court on January 6, 2014. | X  |  |   | X  |   |